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Local Counsel to Local Texas Tax Authorities

-and-

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Lead Attorneys for Local Texas Tax Authorities,

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

IN RE: CIRCUIT CITY STORES, INC., et al.

Case No. 08-35653-KRH
Jointly Administered
Chapter 11 Proceedings

Debtor(s).

**MOTION FOR ADMISSION OF
MICHAEL REED PRO HAC VICE**

Kevin A. Lake (“Movant”), a member in good standing of the Bar of the State of Virginia, an attorney admitted to practice before the United States District and Bankruptcy Courts of the Eastern District of Virginia, and a partner with the Richmond, Virginia office of the law firm of Vandeventer Black, LLP and local counsel in this case for Tax Appraisal District of Bell County, County of Brazos, County of Comal, County of Denton, Longview Independent School District, City of Waco/Waco Independent School District, Midland Central Appraisal District, Central Appraisal District of Taylor County, County of Williamson, Bexar County, Cameron County, Cypress-Fairbanks ISD,

Dallas County, Ector CAD, El Paso, Fort Bend County, Frisco, Grayson County, Gregg County, Harris County, Irving ISD, Jefferson County, McAllen, McAllen ISD, McLennan County, Montgomery County, Nueces County, Rockwall CAD, Rockwall County, Round Rock ISD, San Patricio County, Smith County, South Texas College, South Texas ISD, Tarrant County and Tom Green CAD (“Local Texas Tax Authorities”), hereby moves the Court to enter an Order permitting Michael Reed, with the Round Rock, Texas office of the law firm of McCreary, Veselka, Bragg & Allen, P.C. (the “Admittee”), to practice *pro hac vice* before the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, to represent the interests of Local Texas Tax Authorities, pursuant to Eastern District of Virginia Local Bankruptcy Rule 2090-1(E)(2), in the above-captioned proceeding. In support of this motion, the Movant states as follows:

1. The Admittee is a member in good standing of the bar of the State of Texas, admitted to practice, *inter alia*, before the Texas Supreme Court and the U.S. District Court for the Eastern Division of Texas. There are no disciplinary proceedings pending against the Admittee. The Admittee understand that if he is admitted *pro hac vice*, he will be subject to the disciplinary jurisdiction of this Court.
2. Movant requests that the Court grant this Motion so that the Admittee may file pleadings and appear and be heard at hearings in this chapter 11 case in accordance with the requirements of Eastern District of Virginia Local Bankruptcy Rule 2090-1(E)(2).
3. Movant and his law firm shall serve as local counsel with the Admittee in these cases.

4. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion, Movant requests that the requirements that all motions be accompanied by written memorandum be waived.

5. Notice of this Motion has been given to the Office of the United States Trustee for the Eastern District of Virginia, to local counsel for the above-captioned debtors, to local counsel for the unsecured creditors committee, and to all parties receiving electronic notice in this case. Due to the administrative nature of the relief requested herein, Movant submits that no other or further notice need be given.

WHEREFORE the Movant respectfully requests that the Court enter an Order (i) permitting the Admittee to appear *pro hac vice* in association with the Movant as counsel for Local Texas Tax Authorities in these cases and (ii) granting such other further relief as is just and proper.

Dated: January 15, 2009

Respectfully submitted,

Vandeventer Black, LLP

By: /s/ Kevin A. Lake

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-- and --

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Lead Attorneys for Local Texas Tax Authorities

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of January, 2009, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice was served on all persons receiving electronic notice in these cases, including the following:

Robert B. Van Arsdale
Office of the United States Trustee
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/s/ Kevin A. Lake

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